

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

RICHARD HUBBARD, III, et al.,	)	CASE NO.: 1:18-CV-02252
	)	
Plaintiffs,	)	JUDGE DAN AARON POLSTER
vs.	)	
	)	<b><u>DEFENDANTS' PROPOSED REPORT</u></b>
CITY OF EUCLID, et al.,	)	<b><u>OF PARTIES PLANNING MEETING</u></b>
	)	<b><u>UNDER FED. R. CIV. P. 26(f) AND</u></b>
Defendants.	)	<b><u>LOCAL RULE 16.3(b)</u></b>
	)	
	)	

1. Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.3(b), a meeting was held on December 11, 2018, and was attended by:

Counsel for Plaintiff(s):

James Climer

Counsel for Defendant(s):

Officer Michael Amriott,  
Officer Matt Gilmer,  
Officer Kirk Pavkov

Kelley Sweeney

Counsel for Defendant(s):

City of Euclid

2. Defendants have exchanged initial disclosures as required by Fed.R.Civ.P. 26(a)(1) and the Court's prior order.

3. The parties recommend the following track:

<input type="checkbox"/> Expedited	<input checked="" type="checkbox"/> Standard	<input type="checkbox"/> Complex
<input type="checkbox"/> Administrative	<input type="checkbox"/> Mass Tort	

4. This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms:

<input type="checkbox"/> Early Neutral Evaluation
<input type="checkbox"/> Mediation
<input type="checkbox"/> Arbitration

- ☐ Summary Jury Trial
- ☐ Summary Bench
- ☒ Case not suitable for ADR at this time.

5. The parties ☐ do/ ☒ do not consent to the jurisdiction of a United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

- (a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

Depositions of parties and pertinent witnesses

Interrogatories

Requests for Admissions

Requests for Production

The foregoing will seek information concerning Plaintiffs' claims and Defendants' defenses.

- (b) The parties (indicate one):

☐ agree that there will be no discovery of electronically-stored information; or

☐ have agreed to a method for conducting discovery of electronically-stored information; or

☒ have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District Ohio Local Rules).

- (c) Discovery cut-off date: **June 27, 2019 for liability and damages**

- (d) Handling of expert discovery: **July 27, 2019 for Plaintiffs and August 27, 2019 for Defendants**

7. Recommended dispositive motion date: **August 27, 2019**

8. Recommended cut-off for amending the pleadings and/or adding additional parties: **March 12, 2019**

9. Recommended date for a Status Hearing: **July 13, 2019**
10. Other matters for the attention of the Court: **The preservation of 5<sup>th</sup> Amendment rights against self-incrimination may become an issue.**

*/s/ Kelley A. Sweeney (by e-mail consent)*

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*s/Amily A. Imbrogno*

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*Counsel for Defendants Officer Michael  
Amiott, Officer Matt Gilmer, and Officer Kirk  
Pavkov*

**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, December 11, 2018, a copy of the foregoing Defendants' Proposed Report of Parties Planning Meeting Under Fed. R. Civ. P. 26(f) and Local Rule 16.3(b) was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/Amily A. Imbrogno*

AMILY A. IMBROGNO (0092434)

Counsel for Defendants Officer Michael Amiott,  
Officer Matt Gilmer, and Officer Kirk Pavkov

EUCLID-180272/Report of Parties Planning Meeting